

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

THELMA JONES, PRIYIA LACEY, FAISA  
ABDI, ALI ALI, RUKIYA HUSSEIN, LUCIA  
PORRAS, DAVID TROTTER-FORD, AND  
SOMALI COMMUNITY RESETTLEMENT  
SERVICES, INC.,

*Plaintiffs,*

v.

CITY OF FARIBAULT,

*Defendant.*

Case No. 18-cv-1643 (JRT/HB)

**AFFIDAVIT OF ALEJANDRO  
ORTIZ IN SUPPORT OF  
PLAINTIFFS' MOTION TO  
COMPEL**

The undersigned affiant, Alejandro Ortiz, having first been duly sworn, hereby deposes and says:

1. I submit this affidavit in support of Plaintiffs' Motion to Compel.
2. I am a Senior Staff Attorney with the American Civil Liberties Union Foundation Racial Justice Project, and counsel to Plaintiffs in the above-captioned case. I submit this affidavit in support of Plaintiffs' Memorandum of Law in support of their Motion to Compel. Based upon my work in this case, I have become familiar with and obtained knowledge of the documents attached to this affidavit. The following facts are within my personal knowledge, and, if called and sworn as a witness, I could and would testify competently to them.
3. **Exhibit A** is a true and correct copy Defendant's March 15 Privilege Log.

4. **Exhibit B** is a true and correct copy of a letter attached to an email from Plaintiffs' Counsel, Alejandro Ortiz, to Defendant's counsel, dated March 21, 2019.

5. **Exhibit C** is a true and correct copy of a letter attached to an email from Defendant's counsel, Jason Kuboushek, to Plaintiffs' counsel, dated March 22, 2019.

6. **Exhibit D** is a true and correct copy of a letter attached to an email from Plaintiffs' counsel, Alejandro Ortiz, to Defendant's counsel, dated March 29, 2019.

7. **Exhibit E** is a true and correct copy of a letter attached to an email from Defendant's counsel, Paul Reuvers, to Plaintiffs' counsel, dated April 4, 2019.

  
Alejandro Ortiz

Sworn to before me this 10<sup>th</sup> day of  
April, 2019

  
Notary Public

